

William Brown  
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June 27, 2013

**Via ECF**

Hon. E. Thomas Boyle  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: Konrad v. Epley, et al  
Docket No. 12 CV 4021 (JFB)(ETB)

Honorable Judge Boyle:

My letter is in opposition to plaintiff's letter motion dated June 26, 2013 and in request for sanctions. Ms. Konrad's unfounded allegations, as against me, are untrue and her conduct highly unprofessional. The lack of merit in plaintiff's own filings cannot possibly be an acceptable basis to impugn the character of others with not a shred of evidence in support, but are nonetheless hallmark of her allegations, as against me.

Ms. Konrad is in violation of multiple NYSBA Rules of Professional Conduct. Her only aim is to harass others, using her status as an attorney to obtain legal work for free, in a matter that she openly admits to lack the competence to handle, while vexatiously costing others time and money. Respectfully, pursuant to NYSBA Rule 1.1(b), she has no business before this Court without competent counsel in assistance. It is my sincerest hope that the Court will recognize one of my requests for sanctions against Ms. Konrad. A review of the Court's docket warrants their notice many times over and, absent repercussion, her misconduct will continue.

She has littered the docket with frivolous allegations and nonsense to frustrate the proceedings. Just a few examples of Ms. Konrad's inappropriate conduct include filing a motion pursuant to a statute limited in its protection of minorities (DE 1), which she is not, filing a motion pursuant to CPLR 3025(b) and (c) (DE 49), using this proceeding to request the Court to grant an injunction and moratorium in a completely unrelated matter (DE 84) and serving four memoranda in opposition against each defendant's motion to dismiss.

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I also note that my letter to the Court dated June 13, 2013 (DE 98) in opposition to plaintiff's letter motion dated June 12, 2013 (DE 90) did not appear on the Court's docket until this morning. Although my opposition to plaintiff's motion is moot, my letter motion for sanctions remains unaddressed and, respectfully, warrants notice.

If plaintiff's conduct continues to evade address, it is my sincerest hope that the Court pays particular notice to her memorandum in opposition to my motion to dismiss, in which she openly expresses contempt for the judiciary, even arguing "judicial negligence" as a basis to negate *res judicata*. (¶¶ 72-73)

Given the material delay in the Court's posting of my last cross-motion for sanctions dated June 13, 2013 (DE 98) and seeming disadvantage imposed, I hope the Court will accept my request of counsel Malone to facilitate the filing of this letter motion via ECF.

Respectfully,

A handwritten signature in dark ink, appearing to read 'W. Brown', with a long, sweeping horizontal stroke extending to the left.

William Brown

cc: Evelyn Konrad, Esq.  
via ECF